

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CASCADES COMPUTER INNOVATION, LLC.,

Plaintiff,

v.

SONY ERICSSON MOBILE COMMUNICATIONS  
(USA) INC.

Defendant.

Civil Action No. 1:11-cv-7223

The Honorable Robert W. Gettleman

**DEFENDANT SONY ERICSSON MOBILE COMMUNICATION (USA) INC.'S  
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Sony Ericsson Mobile Communications (USA) Inc. (“Sony Ericsson”) by and through its attorneys, and pursuant to Federal Rules of Civil Procedure 12(b)(6) hereby moves the Court to dismiss Plaintiff Cascades Computer Innovation’s (“Cascades”) Complaint for failure to state a claim. In its Complaint, Cascades fails to set forth the requisite allegations to properly plead direct and contributory infringement.

In further support thereof, Sony Ericsson submits its Memorandum of Law herewith.

Dated: January 26, 2012

/s/Jonathan E. Retsky

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*Attorneys for Defendant Sony Ericsson Mobile Communications (USA) Inc.*

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that on January 26, 2012, I caused to be electronically filed the foregoing  
**DEFENDANT SONY ERICSSON'S MOTION TO DISMISS PLAINTIFF'S  
COMPLAINT** with the Clerk of the Court for the Northern District of Illinois using the ECF  
System, which will send notification to counsel of record. I also certify that I have caused to be  
sent the document by U.S. mail to the following counsel:

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